

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

A.G., a minor child; D.A., a minor child; )  
A.L., a minor child; M.K., a minor child; )  
and M.H., a minor child; )  
   )  
**PLAINTIFFS,**                                     )  
   )   **CASE NO: 2:05-CV-1090-MEF**  
VS.   )  
   )  
**AUTAUGA COUNTY BOARD OF**                     )  
**EDUCATION, et al.,**                             )  
   )  
**DEFENDANTS.**                                     )  
  
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B.H., a minor child, by and through his )  
mother and next of friend, D.S., )  
   )  
**PLAINTIFFS,**                                     )  
   )  
VS.   )   **CASE NO: 2:06-CV-0393-MEF**  
   )  
**AUTAUGA COUNTY BOARD OF**                     )  
**EDUCATION, et al.,**                             )  
   )  
**DEFENDANTS.**                                     )  
   )

**AUTAUGA COUNTY BOARD OF EDUCATION, JOSEPH L. BUTLER AND  
DENE CLEVELAND'S EXHIBIT LIST**

COME NOW Defendants Autauga County Board of Education, Joseph L. Butler and Dene Cleveland and pursuant to this Court's pretrial scheduling Order, and submits this, their exhibit list, for trial:

**I. Documents and Exhibits the defendants plan to use at trial:**

At this time, the defendants have not decided the format of exhibits they plan to use at trial,

and reserve the right to use each of the following in document form, projection form or the original document form:

1. Policies JAA, GAE, GAE-R, GBNAB and IFAB of the Autauga County Board of Education;
2. State of Alabama Department of Education Substitute Teacher's License for Terry C. Wright;
3. Autauga County Board of Education September, October and November 2004 Substitute Lists; and
4. Alabama Department of Human Resources Child Abuse/ Neglect Central Registry Clearance of Terry C. Wright.

II. Documents the defendants may use at trial:

1. Only to the extent and for those parts admissible and required by this Court to be listed as an Exhibit, the exhibits attached to the depositions of the parties taken in this case;
2. Student Records of the plaintiff students from the Autauga County school system;
3. Child Protect videotaped statements of the plaintiff students A.G., M.H., M.K., A.L., D.A. and B.H.;
4. Student Handbooks and Faculty Handbooks for Prattville Elementary School, Prattville Intermediate School, Prattville High School;
5. Parent- Student Code of Conduct for the Autauga County school system;
6. Incident Reports given by plaintiff parents and/or plaintiff students to Prattville Police Department; and
7. Printed policies and procedures of the Autauga County Board of Education.

8. Any document listed on the plaintiffs' Exhibit List.

Any other documents needed for rebuttal, impeachment, authentication, corroboration, and/or to address issues previously not raised in this case, but raised by plaintiffs or any other defendant at trial, in accordance with the Court's rulings, Pretrial Order, the Federal Rules of Civil Procedure and Federal Rules of Evidence

By disclosing the exhibits above, the defendants do not agree or stipulate that any or all of the exhibits are admissible and reserves their right to object as allowed by the Court's pretrial Order, the Federal Rules of Evidence and the Federal Rules of Civil Procedure. Though the defendants do not anticipate any other exhibits, as their right, the defendants reserve the right to utilize any exhibits listed or used by any other party to which the defendants do not object or exhibits for rebuttal, impeachment, corroboration or authentication of evidence or testimony, and in addition, for any unanticipated general or specific issue which may arise at trial concerning any aspect of the allegations.

Respectfully submitted,

*s/Katherine C. Hortberg*

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**CERTIFICATE OF SERVICE**

I hereby certify that I have on this **25<sup>th</sup>** day of April, **2007**, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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*s/Katherine C. Hortberg*

OF COUNSEL